

EXHIBIT 2

***UNREDACTED VERSION
OF DOCUMENT
SOUGHT TO BE SEALED***

EXHIBIT 2

20170825 (DEPOSITION OF M JANOSKO) (002).txt
 UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

WAYMO LLC,)
)
 Plaintiff,)
 vs.) Case No.
) 3:17-cv-00939-WHA
 UBER TECHNOLOGIES INC.,)
 OTTOMOTTO LLC; OTTO)
 TRUCKING LLC,)
)
 Defendants.)

Videotaped deposition of MICHAEL MURRAY JANOSKO, n
 on behalf of the Defendants Otto Trucking LLC; Uber
 Technologies, Inc., Ottomotto LLC at the Law Offices
 of Quinn Emanuel Urquhart & Sullivan, Level 15, 111
 Elizabeth Street in Sydney, Australia, beginning at
 9.55am and ending at 12.29pm on Friday, 25 August
 2017 before Melissa Hook, Court Reporter of Pacific
 Transcriptions.

00001

APPEARANCES:

For Plaintiff Waymo LLC:
 BY: MICHELLE FOX
 QUINN EMANUEL URQUHART & SULLIVAN LLP
 Level 15, 111 Elizabeth Street,
 Sydney NSW 2000
 Tel: +61 9146 3666

For Defendants Otto Trucking LLC:
 BY: HONG-AN VU (hvu@goodwinlaw.com)
 GOODWIN PROCTER LLP
 601 S Figueroa Street, 41st Floor
 Los Angeles, California 90017
 Tel: +1 213 426 2500
 Fax: +1 213 623 1673

For Defendants Uber Technologies, Inc. and Ottomotto
 LLC:
 BY: CAIN NORRIS (CNorris@BSFLLP.com)
 BOIES SCHILLER FLEXNER LLP
 1401 New York Ave, NW
 Washington, DC 20005
 Tel: +1 202 237 2727
 Fax: +1 202 237 6131

00002

I N D E X

<MICHAEL MURRAY JANOSKO(9.58AM)	1
EXAMINED BY MS VU	
(Exhibit 2190 notice of deposition)	7
(Exhibit 2191 Michael Janosko's	7
declaration)	
(Exhibit 2192 Amended Notice of	42
Deposition of Michael Janosko)	
(Exhibit 2193 Information Security	42

20170825 (DEPOSITION OF M JANOSKO) (002).txt

00017

1 10. 29 credential protection for the SVN, as in your
 2 declaration?
 3 A. I spoke with the system administrator of the
 4 Subversion server at the time.
 5 Q. Who was that person?
 6 A. Sasha Zbrozek.
 7 Q. And so he supplied you with the information related
 8 to protection of the SVN, is that correct?
 9 A. Correct.
 10 Q. Correct?
 11 A. Correct.
 12 Q. Did you have any independent knowledge of your own
 13 aside from what he told you?
 14 A. No. I'm sorry, I verified his information.
 15 Q. What did you do to verify his information?
 16 A. I looked at change logs for reviewing active users
 17 so one of the controls is that they review the user
 18 list for appropriateness and I saw that process in
 19 action. I also saw the configuration of a client
 20 service for Subversion, where you have to enter the
 21 user name and password and that actually is
 22 encrypted. And I'm also aware that users that don't
 23 have authorised access to the service are not
 24 permitted to access it.
 25 Q. Okay. So who manages the security controls for the

00018

1 10. 31 SVN server?
 2 A. The administrator of the SVN server.
 3 Q. So does your group have any involvement in the
 4 security protocols for the SVN server?
 5 A. No, we did not have direct involvement.
 6 Q. And you stated earlier you had I think, it was about
 7 ■ people working for you. Are any of those
 8 individuals involved in management of the SVN
 9 server?
 10 A. No.
 11 Q. So your security team is primarily focussed on
 12 protecting other aspects of Google's infrastructure,
 13 is that accurate?
 14 A. Correct.
 15 Q. In conferring with Mr Zbrozek, did he - did you
 16 learn how often the credentials for accessing SVN
 17 server are audited?
 18 A. I believe he said monthly.
 19 Q. Do you know if that's at the beginning of the month
 20 or at the end of the month?
 21 A. I don't know.
 22 Q. So do you know if an employee who leaves
 23 on September 1st, would that employee's credentials
 24 remain active until September 30th, if that's when
 25 the auditing occurs?

00019

♀ 1 10. 32 A. I don't know.
 2 Q. I believe that you had testified at your deposition
 3 that you had never accessed the SVN server, is that
 4 still accurate?
 5 A. That's correct.
 6 Q. At the time that you were conferring with Mr Zbrozek
 7 about the SVN server, did he show you the process
 8 for accessing the SVN server?
 9 A. Yes, he did.
 10 Q. So you haven't yourself logged in but you got to see

20170825 (DEPOSITION OF M JANOSKO) (002).txt

11 sort of a demonstration of what that procedure was
 12 like?
 13 A. I am not authorised to log in.
 14 Q. Okay. And can you describe for us what you saw as a
 15 log-in process?
 16 A. Sure. There's a configuration screen and within
 17 that screen you enter the - some details about the
 18 connection, the server name, specifying that it's an
 19 encrypted connection. I think there is a port
 20 number and user name and password.
 21 Q. How did you reach the point where you would provide
 22 this information, was it through a web browser?
 23 What was the interface that you would, you know,
 24 that you'd use in order to access, you know, the
 25 screen where you could type in the password and log

00020

♀ 1 10. 34 in eventually?
 2 A. I believe it was a configuration screen for
 3 TortoiseSVN.
 4 Q. And do you know if TortoiseSVN, in order to access
 5 the SVN server, would use a regular internet
 6 browser?
 7 A. I don't know.
 8 Q. When you were doing this - seeing this demonstration
 9 provided by Mr Zbrozek, were you within Google's
 10 network at that point? For example, within a Google
 11 facility where you would already be within Google's
 12 infrastructure in general?
 13 A. This is over GVC, so I am not sure what his network
 14 posture was when he connected.
 15 Q. Did he show you what the process would look like if
 16 a user were logging into a SVN server remotely?
 17 A. There was no designation whether this was a remote
 18 login or local login when he demonstrated that to
 19 me.
 20 Q. Are you aware of any differences with accessing the
 21 SVN server whether you're on Google property versus
 22 remotely accessing the network?
 23 A. I'm not aware of any differences.
 24 Q. Are you aware of the use of - are you aware that
 25 users are able to access the SVN server using an

00021

♀ 1 10. 36 internet browser like Explorer or Mozilla or Chrome?
 2 A. No, I wasn't aware of that.
 3 Q. Are you aware of any controls in place to monitor
 4 whether a person is accessing the server remotely?
 5 A. I am aware of logs that occur during user activity
 6 with Subversion. I am not sure if it - what it
 7 records beyond the activity within the source code
 8 repository and the user name.
 9 Q. For Google's infrastructure, is there a firewall
 10 that provides outer protection to the things you
 11 know that you're - that Google folks are working on?
 12 A. Can you clarify what part of Google you're asking
 13 about?
 14 Q. Sure. Well, I'll see if I can. I'm not familiar
 15 with all the parts in Google, so I may not know.
 16 But, in general, is a firewall a security tool that
 17 Google would use to protect certain areas of its
 18 confidential - or certain areas that it keeps
 19 confidential information?
 20 A. Yes.
 21 Q. Would the SVN server repository be behind Google's

20170825 (DEPOSITION OF M JANOSKO) (002).txt
happening?

A. So the discovery of a transaction outside of our offices and our technology is very hard to detect. Right? So when you say

Q. So what do you do?

A. That is one of the controls, yes.

Q. Do you know if Waymo has the same control?

A. I am not aware if they use that. Let me amend that. To the extent that they use Google credentials to

access Google services, then they do benefit from the same controls.

Q. Are the credentials to access the SVN server the same as the credentials for Google access and Google networks?

A.

A. I am not familiar with the way that Subversion protects credentials.

Q. So you don't know how or whether Subversion credentials are protected, is that correct?

A. I am not aware with Subversion, with the service, to comment, to make a judgment on that.

Q. Okay. At the point that you joined Google security team, Waymo had not been formed yet, correct?

A. I don't know the date when Waymo was formed.

Q. Okay. So my understanding is that at that point Waymo was still part of the Google network, Google corporate umbrella in that sense. It was a division of Google called Project Chauffeur. Do you have any understanding of that?

A. I don't know the date when they were officially graduated. I understand they are now and I know that they were Chauffeur at some point, but I don't know when that transition occurred.

Q. And at the point that you joined this team project, this Chauffeur team was already using the Subversion server, is that correct?

A. I am not sure of the timeline of the usage of that, other than - aside from what's already been placed in the Subversion.

Q. And so even though Chauffeur at the point that you joined was still part of Google, if they were using the Subversion server they were already operating on a part of the network system that you primarily helped maintain?

MS FOX: Objection as to form.

A. I am not sure if they were actively using it when I

20170825 (DEPOSITION OF M JANOSKO) (002).txt

18 joined and I'm also not aware of the timelines when
19 they were broken out.

20 Q. Okay. But are you aware of the Subversion server?
21 Strike that. Let me think about how I can raise
22 this. By its nature is a Subversion server
23 different from - treated differently from something
24 like Gmail, which is in Google's network?

25 A. Can you clarify what you mean by "treated"?

00027

♀

1 10.46 Q. Sure. So your declaration here has several pages
2 where you talk about this multilayered Google
3 infrastructure, but then you also say that
4 Subversion is not on this network?

5 A. Correct.

6 Q. Are you aware of at any point Subversion being on
7 the Google network such that it would be protected
8 in the - by the tools that are described in the
9 first - pages 2 to 5 of your declaration?

10 A. I am not aware of any time when it was internal.

11 Q. Okay. When we go through some of the aspects of
12 your declaration, so here in paragraph 7 you talk
13 about that

[REDACTED]

[REDACTED]

19 Q. So in paragraph 8, what is your definition of when
20 credentials are compromised?

21 A. When a user name or password or equivalent security
22 token is made accessible and reused by another
23 entity, unauthorized entity.

24 Q. What do you do to monitor whether an unauthorized
25 entity has used credentials?

00029

♀

1 10.50 A. There are heuristics that we can apply around access
2 timing, access location, access - the nature of

20170825 (DEPOSITION OF M JANOSKO) (002).txt

10 Q. Do you know whether the SVN server was monitored by
11 [REDACTED]?

12 A. I don't know.

13 Q. In paragraph 18 you talk about how Google invests
14 heavily in securing its infrastructure with many
15 hundreds of engineers dedicated to security and
16 privacy distributed across all of Google. Do you
17 know how many of those - whether any of those
18 individuals are devoted to securing the SVN server?

19 A. I don't know.

20 Q. The engineers that you reference in paragraph 18, do
21 you have a sense of how they're organised in terms
22 of their responsibilities for securing the
23 infrastructure?

24 A. At a high level, yes.

25 Q. How are they organised?

00037

♀

1 11.04 A. So generally, there are three groups that make up
2 the security engineering side of security and
3 privacy, detection and response, enterprise and
4 constructive protection and security engineering and
5 assessments. There is also a large contingent of
6 security engineers working on securing Google behind
7 the scenes and our production environment and the
8 software that runs on top of it.

9 Q. So you are not aware of - or you do not know whether
10 any of these individuals are tasked with monitoring
11 the Subversion server?

12 A. No, I don't know.

13 Q. In paragraph 21 of your declaration, which is
14 exhibit 2191, you're talking about incident
15 management, what do you consider to be an incident?
16 A. The full definition of an incident - I will give you
17 a summary of what I consider an incident. I think
18 we have an official definition I'm not precisely
19 familiar with.

20 Q. Okay.

21 A. But an incident in this case is a set of anomalous
22 signals or alerts that together with a reasonable
23 amount of confidence indicates something bad
24 happened.

25 Q. How do you know something is anomalous?

00038

♀

1 11.06 A. Anomaly detection kind of starts with the
2 identification of what is normal, and when things
3 fall outside the bounds of that they can be
4 considered anomalous. Additionally if we have,
5 through our experience and security and within the
6 industry and within our threatened intelligence
7 groups, a good idea of what is malicious, and what
8 activities are malicious, and we can monitor an
9 alert for those.

10 Q. How do you come to an understanding of what is a
11 normal activity?

12 A. You collect a lot of data and measure whether that
13 is appropriate access or not.

14 Q. So if you wanted to find out whether downloading
15 documents is anomalous, do you first have to figure
16 out what - whether the downloaded documents is done
17 by many people in a given group, would you agree
18 with that?

19 A. I am sorry. Can you restate that?

20 Q. Sure. In order to conclude that downloading 9

20170825 (DEPOSITION OF M JANOSKO) (002).txt

20 Q. And in this instruction to say "downloaded and
21 install TortoiseSVN", my understanding is that this
22 is sort of an instruction on the first time you're
23 accessing the Subversion server, would you agree
24 with that?

25 MS FOX: Object as to form.

00056

♀

1 11.45 A. I would agree that this is about configuration of
2 the Altium and Subversion connection.

3 Q. Okay. So after downloading and installing
4 TortoiseSVN, bullet 2 here says: "Pick a place on
5 your filesystem in to which to check out the
6 repository." This language here is where it says to
7 check out the repository. Do you have an
8 understanding of what that means?

9 MS FOX: Object to form.

10 A. No, I don't.

11 Q. Do you have any understanding about whether this
12 means the entire repository becomes available to the
13 user?

14 MS FOX: Object to form.

15 A. I don't know.

16 Q. The next paragraph says: "Be aware that
17 'chauffeur-svn' will be created as a subfolder in
18 that location. Placing it in your root 'C:\', works
19 pretty well." Do you have an understanding what
20 those sentences mean?

21 MS FOX: Object to form.

22 A. I understand this will create a folder in the
23 installation directory or a director called
24 chauffeur-svn.

25 Q. And so does that mean that after downloading and

00057

♀

1 11.46 installing SVN, the user then would essentially take
2 a place on their computer, likely the C drive, where
3 the SVN repository would be downloaded?

4 A. I don't know that this - I don't know.

5 Q. Did this come up at all in any of your conversations
6 with Mr Zbrozek as to how the SVN server works?

7 MS FOX: Object to form.

8 A. No.

9 Q. Paragraph 24 of your declaration you state: "As
10 of December 11, 2015 Waymo's SVN repository
11 contained 9.7 gigabytes of confidential and
12 proprietary internal Waymo information."

13 Now I understand that you have not accessed
14 the SVN repository. Where did you obtain this
15 information about the size of the SVN repository?

16 MS FOX: Object to form.

17 A. Through a conversation and a demonstration with
18 Sasha Zbrozek.

19 Q. So he informed you that 9.7 gigabytes of
20 confidential and proprietary information was on the
21 Subversion server?

22 A. And he showed me a file size indicator of the folder
23 to verify the size.

24 Q. Okay. And aside from that demonstration you didn't
25 have any independent knowledge of the Subversion

00058

♀

1 11.48 server?

2 A. I did not.

3 Q. The next sentence says: "Two gigabytes of bad data
4 related to Waymo's LiDAR Technology." Are you

20170825 (DEPOSITION OF M JANOSKO) (002).txt

- 5 familiar with Waymo's Li DAR Technology?
 6 A. Only what's kind of general technology knowledge in
 7 the news.
 8 Q. Okay. Would you be able to identify what is Li DAR
 9 Technology versus other confidential information?
 10 MS FOX: Object to form.
 11 A. I'm not sure.
 12 Q. So how was it that you're able to identify that two
 13 gigabytes of the 9.7 gigabytes that were on the SVN
 14 server specifically related to Waymo's Li DAR
 15 Technology?
 16 MS FOX: Object to form.
 17 A. Through conversations with Sasha. He indicated this
 18 is where the Li DAR - this folder is where the Li DAR
 19 Technology documents reside and he showed me the
 20 file size, the folder size.
 21 Q. So the repository was organised by folders, is that
 22 correct?
 23 A. Yes.
 24 Q. And then he pointed to a folder that says this has
 25 the Li DAR Technology?

00059

- ♀ 1 11.49 A. Correct, and showed me the file size, the folder
 2 size.
 3 Q. Aside from that, you don't know whether that folder
 4 actually contained the Li DAR Technology --
 5 MS FOX: Object to form.
 6 Q. --or documents relating to the Li DAR Technology,
 7 correct?
 8 A. I gained this information from Sasha who informed me
 9 of the type of documents that were in there.
 10 Q. And as the SVN administrator, did he work - do you
 11 know whether he worked on Li DAR Technology?
 12 A. I don't know.
 13 Q. Aside from his demonstration, is it accurate to say
 14 that he wouldn't be able to look at the 9.7
 15 gigabytes of data that was on the server and be able
 16 to say this is where the Li DAR Technology was
 17 located?
 18 A. I am sorry. Can you repeat the question?
 19 Q. Sure. Basically what I'm trying to get out is the
 20 information that you provided here in paragraph 24,
 21 that was entirely provided to you by Sasha Zbrozek,
 22 is that correct?
 23 A. Yes.
 24 Q. And you independently would not have been able to
 25 recognise whether something related to Li DAR

00060

- ♀ 1 11.51 Technology or not?
 2 A. I don't know. I've never tried.
 3 Q. Okay. That's fine. I believe you testified earlier
 4 that one of your roles is sort of to plan and help
 5 organise the Google infrastructure. In that role
 6 would you prefer that the SVN server be replaced
 7 with, for example, Google's version control system?
 8 MS FOX: Object to form.
 9 A. I don't have information to make a judgment one way
 10 or the other.
 11 Q. Okay. Are you aware of anyone ever - are you aware
 12 of Google ever evaluating whether it should continue
 13 to use the SVN server?
 14 A. I am not aware of any evaluations.
 15 Q. Are you aware of any research that anyone at Google

20170825 (DEPOSITION OF M JANOSKO) (002).txt

♀ 1 11.56 A. To the extent that they used Google credentials
2 because they did use Google infrastructure, then
3 these policies would apply because they are Google
4 protected credentials. For other credentials that
5 were specific to Waymo, I don't know what their
6 policy was.
7 Q. Is there anything that is done by either Google or
8 Waymo to ensure that users are not sharing
9 credentials?
10 A. For Google, for example, which I can speak to,
11 credentials are not sufficient to gain access to
12 systems. There's a second factor that we need to
13 have in place in order for that authentication to be
14 successful. So there is no value in me giving
15 someone else my password. So that is one way we
16 mitigate against the risk of a compromised device.
17 Q. What is the second step?
18 A. There is a cryptographically-signed key that lives
19 inside of a hardware device that sits as an
20 extension to the laptop. It's a little key fob and
21 you touch that and it's only something that I have
22 and that paired with my credentials allows me
23 access.
24 Q. Okay. So let me make sure I understand the
25 procedure for accessing Google's network. Would it

00064

♀ 1 11.57 be that a user first enters the login name and the
2 password and then must also plug in this key fob in
3 order to access the network?
4 A. It's generally always - it's so small it just sits
5 in your USB port. So just you tap it. You actually
6 have it interact with it. It can't just be sitting
7 there passively.
8 Q. I see. So is that key fob removable? Like, can you
9 put it into a personal device such that - you know a
10 personal laptop - such that that laptop can access
11 Google's network?
12 A. I don't know if there's technical limitations to
13 that specifically.
14 Q. Sure. Sorry. I shouldn't have interrupted you.
15 Without that key fob can a user access on their
16 personal device Google's network?
17 A. There are some services that they can, because this
18 second factor of authentication is limited to our
19 higher sensitivity application environments.
20 Q. Are you aware of the members of Chauffeur having
21 this key fob?
22 A. I am aware of them using Google corporate devices
23 and credentials which would require the usage of
24 this key fob as well.
25 Q. Okay. Do you know whether the Subversion server can

00065

♀ 1 11.59 only be accessed if a user has that key fob?
2 A. In the demonstration that Sasha showed me he didn't
3 indicate that it was.
4 Q. Okay. So you state here that approximately ■
5 employees and contractors working on projects for
6 Waymo have security permissions to access the
7 server. Do you know whether - you know, how long
8 contractors are usually working for Google?
9 A. For Google or for Chauffeur?
10 Q. We can start with Google and then we can go to
11 Chauffeur as well?

20170825 (DEPOSITION OF M JANOSKO) (002).txt

- 12 A. I don't know the answer to either of those
13 questions.
14 Q. Okay. No, understandable. What I am getting at is
15 a contractor is usually a temporary employee, is
16 that correct?
17 MS FOX: Object to form.
18 A. They are not full-time employees, correct.
19 Q. Full-time. And when a contractor leaves, how soon
20 after they leave are their credentials to the SVN
21 repository revoked?
22 A. I'm trying to remember. I'm not sure.
23 Q. What is considered a stale user?
24 A. Generally I would say a stale user is someone that
25 has not used a service or server or logged in in a

00066

♀

- 1 12.01 while.
2 Q. In a while. What's considered a while?
3 A. That would have differing contexts because different
4 technologies have varying usage rates. Right? So
5 it might be common for someone to log in once a
6 month, it might be common for someone to log in a
7 few hours - every few hours.
8 Q. So if a user has access to SVN - well, first of all,
9 do you know whether your definition of a stale user
10 is also employed by the SVN administrator?
11 A. I don't know.
12 Q. And when you say it really depends on the user
13 activity whether they are stale or not, maybe that
14 person only accesses whatever information we are
15 dealing with once a month or every few months. What
16 tools are in place to determine whether that user is
17 actually stale?
18 A. So--
19 Q. --like if you have one individual - sorry. Go
20 ahead.
21 A. Well, I was going to clarify. I did say that it
22 depends on the user. I said it depends on the
23 technology. The reason I want to clarify that is
24 some technologies - the used cases only generate
25 once a month usage. That is totally reasonable.

00067

♀

- 1 12.02 And so that's why staleness is specific to the used
2 cases of the technology.
3 Q. Do you have any knowledge about what would be
4 considered a stale user for the SVN server?
5 A. I don't.
6 Q. When you say here that "stale users are aggressively
7 purged", what do you mean by that?
8 A. Through a conversation with Sasha, he indicated that
9 stale users are aggressively purged. And I didn't--
10 Q. Did he provide - sorry. Go ahead.
11 A. --and I didn't ask for clarification on that.
12 Q. Okay. And he didn't provide any details on how they
13 were purged or when they were purged?
14 A. I don't recall.
15 Q. Did he tell you anything about whether - if a user
16 didn't access the SVN server for a three-month
17 period of time, for example, would that user's
18 credentials no longer be active?
19 A. Sorry, can you repeat that?
20 Q. Sure. Let's say a user who has access to SVN,
21 didn't access that repository for a three-month
22 period of time, would that user's credentials expire

20170825 (DEPOSITION OF M JANOSKO) (002).txt

23 because that person didn't access the repository for
24 three months?

25 MS FOX: Object to form.

00068

♀

1 12.04 A. I don't know.

2 Q. Would Sasha know?

3 MS FOX: Object to form.

4 A. I don't know.

5 Q. Do you know how often SVN's credentials are updated?
6 For example, is there any requirement that a user
7 change their password, you know, every three months
8 or so?

9 A. I don't know.

10 Q. Does Google have a requirement that users must
11 update their passwords every so often?

12 A. In general use circumstances, not that I am aware
13 of.

14 Q. Do you know who at Waymo determines whether SVN
15 credentials should be revoked?

16 A. I believe it's the Subversion system administrator.

17 Q. Do you know what criteria he uses - he or she uses
18 to make that determination?

19 A. The criteria that he mentioned to me is if they're
20 working on the project or not.

21 Q. Do you know whether users are supposed to
22 self-report whether they stop working on the
23 Chauffeur project?

24 A. I don't know.

25 Q. For example, the person transferred to a different

00069

♀

1 12.06 group, would that - how would that person - let me
2 strike that.

3 How would the SVN administrator know that a
4 user is no longer working on the Chauffeur project?

5 MS FOX: Object to form.

6 A. I don't know.

7 Q. Do you have any knowledge about any systems that
8 track which individuals are working on a particular
9 project?

10 A. Can you add more context?

11 Q. Sure. We'll just focus on Chauffeur at the time
12 that it was part of Google X. Are you aware of any
13 security tools that track which are the employees
14 who are working on Chauffeur?

15 A. They - so I'm aware generally that individuals
16 within the Chauffeur project have special access,
17 for instance, to the building and that would
18 represent a subset of individuals that are currently
19 active.

20 Q. Okay. Does it differentiate between the individuals
21 who are part of the engineering team who would have
22 access to the SVN server versus individuals on the
23 business side?

24 A. The access control list to the Subversion server is
25 a representation of who should have access.

00070

♀

1 12.07 Q. And who compiles or creates the access control list?

2 A. The system administrator, as far as I know.

3 Q. For the SVN server, are you aware of whether
4 passwords automatically expire after a given amount
5 of time?

6 A. I am not aware if they do.

7 Q. Are you aware of any SVN password requirements, like

20170825 (DEPOSITION OF M JANOSKO) (002).txt
there must be a character or a number?

A. I am not aware of any.
Q. Does Google require for its Google access credentials, does it require passwords to have certain security features?

A. Yes.
Q. Would that involve, for example, a character - including a character?

A. Yes.
Q. Or a number?

A. Yes.
Q. In general, what are all the requirements for a password for Google?

MS FOX: Object to form.

A. I don't recall them all off the top of my head, but generally it's a certain length - a certain amount of letters, numbers and special characters.
(Exhibit 2195 Copy of group email)

00071

♀ 1 12.09 Q. Okay. So I'd like to point you to Exhibit 2195, which is Waymo/Uber/00047670?
2
3 A. Okay.
4 Q. Okay. I understand that this is probably before your time, but Mr Sasha Zbrozek's, whom you said was a SVN administrator, said: "Emails away to everyone! Some of the autogenerated passwords have questionable symbols that might cause parsing sadness in TortoiseSVN. If it doesn't work, please holler. Commence the commit carousel!"

Are you aware of instances where symbols might cause difficulty in accessing the SVN server?

MS FOX: Object to form.

A. I know generally of some technologies struggling with special characters. I don't know if Subversion or the Tortoise clients specifically have these issues.

(Exhibit 2196 Email from Sasha Zbrozek)

Q. Okay. Let's look at Exhibit 2196, which ends in - which is a Waymo/Uber/00047597?

A. Okay.

Q. So if we look at these two emails together. They look like they were sent on the same day. Is that correct?

A. I am sorry. I'm looking at the other way.

00072

♀ 1 12.11 Q. I'm looking at the Wednesday, March 18, 2015. The email where we talked about - where Sasha sent emails away to everyone?

A. Okay.

Q. Is it around the same timeframe?

MS FOX: Object to form.

A. So 2195 and 2196. Correct?

Q. Yes.

A. The dates printed on this piece of paper seem to be about a day apart.

Q. Okay. And in the subject line there's a series of letters and numbers, some capital and some symbols. Does this look like it could have been a generated password?

A. I don't know what this is.

Q. Okay. If this were a password are there any symbols that would cause issues in your opinion for logging in?

20170825 (DEPOSITION OF M JANOSKO) (002).txt

00080

♀ 1 12.24 Q. So it would also follow to remove old media, is that
 2 correct?
 3 A. Yes, I presume it would.
 4 Q. Do you know whether Waymo has a policy that
 5 employees are to share in the responsibility for
 6 improving security?
 7 A. I am not familiar with Waymo policies.
 8 Q. How about Google?
 9 A. The phrasing that you used was employees are - can
 10 you repeat that please?
 11 Q. Sure. Are employees of Google encouraged to take
 12 responsibility or share in the responsibility for
 13 security issues?
 14 A. Yes.
 15 Q. For example, how are security issues raised?
 16 MS FOX: Object to form.
 17 A. There's a number of ways in which you can report or
 18 raise attention to a security issue. There's a team
 19 that handles them. You can reach out to them.
 20 There's also forms on our internal websites for you
 21 to report one, either anonymously or associated with
 22 your name, and then you can always raise it to a
 23 peer or a manager.
 24 Q. Okay. What happens when an issue is raised? What's
 25 the next step?

00081

♀ 1 12.25 A. It depends on which one of those paths you've taken.
 2 But if it finds its way to the Google Security
 3 Operations Centre, or GSOC, it would be triaged at
 4 that level.
 5 Q. And would that be by the incident management team
 6 that you talked about earlier?
 7 A. If it becomes an IT security incident, then it would
 8 be, yes.
 9 Q. Okay. Do you know whether Waymo has similar
 10 policies and procedures?
 11 A. I don't.
 12 Q. Do you know whether Waymo considers laptop computers
 13 to be removable media?
 14 A. I don't.
 15 Q. Do you know whether Google considers laptops to be
 16 removable media?
 17 A. I don't.
 18 Q. Since the making of your declarations have you had
 19 any discussions with Mr Zbrozek?
 20 A. No, I haven't.
 21 Q. Since your deposition have you learned anything else
 22 about or anything new about the Subversion server?
 23 A. No, I haven't.
 24 MS VU: I think that's it for me. Cain, do you have
 25 anything? I think you're on mute.

00082

♀ 1 12.27 MR NORRIS: Yes, you're right. Just a few quick
 2 questions. First, Hong-An, could you confirm the
 3 exhibit number that was assigned to your tab number
 4 5?
 5 MS VU: Tab 5 is 2195.
 6 MR NORRIS: Okay. Great.
 7 <EXAMINATION BY MR NORRIS
 8 Q. Mr Janosko, if you would direct your attention back
 9 to Exhibit 2195, which you looked at earlier?
 10 A. Okay.

20170825 (DEPOSITION OF M JANOSKO) (002).txt

22 Q. Okay. And then turning to a different topic, in
23 preparing to submit your declaration, or at any time
24 since, have you ever examined any of Anthony
25 Levandowski's Google-issued devices?

00085

♀

1 12.32 A. No, I haven't.
2 Q. Have you examined log files or forensic images
3 derived from any of those devices?
4 A. No, I haven't.
5 Q. And apart from the demonstration with Mr Zbrozek
6 that you testified to earlier, have you in any
7 manner examined the SVN server?
8 A. No, I haven't.
9 Q. And have you examined network logs or any other logs
10 related to the SVN server?
11 A. No, I haven't.
12 Q. Do you have any personal knowledge related to the
13 SVN server, apart from what you learned from
14 Mr Zbrozek?
15 MS FOX: Object to form.
16 A. In addition to the conversation was also a video
17 demonstration, so I could see over GVC, our video
18 conference, these aspects as well.
19 Q. Okay. Apart from that conversation and that video
20 conference demonstration, do you have any other
21 knowledge of the SVN server?
22 A. No, I don't.
23 MR NORRIS: Okay. No further questions. Thank you.
24 VIDEOGRAPHER: Michelle, do you have anything?
25 MS FOX: No, I have no questions, thank you.

00086

♀

1 12.33 <WITNESS WITHDREW
2 VIDEOGRAPHER: All right. Going off the record at
3 12.29pm. End of tape 2. End of video tape
4 deposition of Michael Janosko. Total number of
5 tapes: 2.
6
7
8
9

END OF TRANSCRIPT

00087

♀